

# EXHIBIT 1

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Declaration Under Penalty of Perjury

COMES NOW, Julie Ramos, who under penalty of perjury, affirms the statements made herein are true:

1. I am a former employee of Diamond Dolls. I believe Diamond Dolls is a limited liability company, which operates a bar/strip club on Spokane Street in Reno, Nevada – the Spice House. I first started working at the Spice House in 2009 as a dancer. In 2014 I began to work as a cocktail waitress and then became a bartender at approximately the end of 2015. At approximately the end of 2017 I began working as a Bar Manager for the Spice House. In approximately December, 2017, I began working as an Assistant Manager at the Spice House. In August and September, 2018, I worked at the Atlantis, but then returned to the Spice House in the capacity of an Assistant Manager. I left employment with the Spice House on March 20, 2019. I left because I ceased to repose trust in Jami Kashmiri and Kami Kashmiri and because I received a text from General Manager, David Hofman. General Manager Hofman told me I was fired. That termination was rescinded by Jami Kashmiri, but I left because I lost trust in the Kashmiri brothers.

2. In November, 2014, a then bartender at the Spice House, Clifton Kyle Smith, began to sexually harass me. Mr. Smith told me he wanted to buy my dirty underwear for \$100 and he wanted to buy Victoria Secrets underwear for me to wear and then give to him. Mr. Smith tried to convince me to take off my underwear, in order to give it to him. I complained to the Spice House General Manager, Brandon Lennar, of Mr. Smith's statements, which I regarded as sexual harassment. Mr. Lennar took no meaningful action. He confined himself to saying, "well, that's just Kyle. That's how he is." I was offended by both Mr. Smith's statements and by the way Mr. Lennar handled my complaint. He failed to do anything meaningful and instead trivialized my complaint. Mr. Smith continued to sexually harass me, e.g., he continued to ask me for my underwear. I did not make any further complaints because I realized nothing would



1 be done if I did complain. Approximately six months after I complained, Mr. Smith was fired  
2 because he was rude to a liquor distributor from Ben's Liquor. I understand Jami Kashmiri  
3 owns Ben's Liquor and the distributor was a friend of Jami Kashmiri.

4 3. After Brandon Lennar's employment was terminated, David Hofman was hired as  
5 the General Manager for the Spice House. Brandon Lennar rehired Mr. Smith as a disc jockey  
6 at the Spice House, just before he lost his employment. The interim during which Mr. Smith  
7 was gone was approximately a year. I believe Mr. Smith was rehired in early 2017, but am not  
8 sure of the date.

9 4. I observed some of Mr. Smith's conduct and statements after he was rehired as a  
10 disc jockey. I watched him speak with the women who danced in private areas and watched  
11 him go into the dressing rooms of the women. I also observed him to go into private rooms  
12 with the women. I also observed Mr. Smith to follow the new women, i.e., young women who  
13 had just been hired to dance, around. Mr. Smith had no reason to engage in such contact in his  
14 capacity as a disc jockey. I observed some of the women who danced give Mr. Smith money  
15 and also to pay his bar tab. I heard Mr. Smith make statements such as "come fuck with a real  
16 nigga, let's make some real money." I heard Mr. Smith make such statements on the premises  
17 of the Spice House as "I'm a pimp", and "I'm a player". He made statements about one  
18 woman, who danced at the Spice named "Dallas". He said, "she was the first ho, I knocked.  
19 She gives me all her money." Mr. Smith openly made such statements on the premises of the  
20 Spice House in my presence and in the presence of other Spice House employees. He did not  
21 appear to care who heard him brag about being a pimp.

22 5. I watched Mr. Smith sell drugs on the premises of the Spice House. On one  
23 occasion, I observed him pass a bag of cocaine to a customer. I observed Mr. Smith and  
24 General Manager Hofman chop up lines of cocaine on a clipboard in the DJ booth at the Spice  
25 House. I also saw Mr. Smith and Mr. Hofman ingest those lines of cocaine by snorting.

26 6. I have seen Mr. Smith, on the premises of the Spice House, provide liquor to  
27 underage women, i.e., women under the age of 21 and have then sit on his lap, and then leave  
28 with them in a cab. I have seen Mr. Smith do this on a number of occasions over the years. He

1 does so openly. I knew which women were under 21 because I was in charge of compiling the  
2 list of the women who were under 21. Mr. Smith did not appear to care who saw him provide  
3 liquor to underage women. I spoke with General Manager Hofman about Mr. Smith providing  
4 liquor to underage women. General Manager Hofman did not do anything meaningful in  
5 response to my report. Instead he manifested anger with me for making the report. I reported  
6 the fact Mr. Smith was providing liquor to underage women on at least three occasions. I did  
7 so because part of my job was to ensure underage women did not drink on the premises. I  
8 discharged this aspect of my job because I was aware having underage women on the premises  
9 could cause the Club to lose its liquor license.

10 7. In January, 2019, I had a meeting with David Hofman, Jesse Zamora and Clifton  
11 Kyle Smith regarding inappropriate behavior with the dancers, giving away liquor to underage  
12 girls and not ringing up drinks properly (stealing alcohol), and Mr. Smith refusing to listen to  
13 myself and Jesse (we were his managers when he worked on our shifts). Mr. Smith was not  
14 disciplined as a result of this meeting. Mr. Hofman trivialized his conduct by characterizing  
15 him as a "flirt" and noted he should not act out against myself and Jesse. General Manager  
16 Hofman asked myself and Jesse Zamora, who also supervised Mr. Smith, to treat Mr. Smith  
17 more lightly. Nothing was accomplished as a result of the meeting, except that Mr. Smith was  
18 emboldened. He continued to violate what the Spice House said were the rules, e.g., he  
19 continued to provide liquor to the underage dancers. Mr. Smith continued to openly brag about  
20 being a pimp after the meeting.

21 8. I became aware of the fact the Spice House was receiving a "buy out fee" for dancers  
22 who left the Club with customers shortly after I started working at the Spice House. The  
23 Manager on duty would set the fee, depending on how much the manager thought the customer  
24 was willing to pay, by how many women were leaving with the customer and what time it was.  
25 The fees varied, but the fee was usually around \$400. I have seen "buy out fees" paid at all  
26 three of the clubs owned and operated by the Kashmiri brothers, i.e., the Wild Orchid, the  
27 Fantasy Girls and the Spice House. Usually the "buy out" fee is paid in cash, but sometimes  
28 the fee was charged via a credit card. The Spice House, and the other two clubs, routinely took



1 a percentage of the amount charged, i.e., these monies were referenced as "dance dollars". The  
2 Club would usually take 30%. That is, if a customer paid a "buy out" fee in order to have a  
3 dancer leave with him, the Spice House, the Wild Orchid and the Fantasy Girls would  
4 customarily take 30%. I understood and I believe everyone involved understood the "buy out"  
5 fees were the Clubs' percentage of monies paid for prostitution, i.e., sex acts which occurred  
6 outside of the Clubs.

7 9. Once the City of Reno started scrutinizing the Clubs owned by the Kashmiris there  
8 was a meeting at which Spice House General Manager David Hofman attended with Jami and  
9 Kami Kashmiri. David Hofman told myself and other managers who worked at the Spice  
10 House, "per Kami and Jami, no more buy outs". I understood and everyone understood the buy  
11 out fees stopped because they were illegal and the Kashmiris did not want the City to learn the  
12 Clubs they operated were profiting from prostitution. I was told to stop buy out fees by  
13 General Manager Hofman in 2018. At the same time, I was instructed Mr. Hofman to change  
14 the Spice House's practices. For instance, I was instructed to tell the dancers they were no  
15 longer at liberty to discuss leaving with the customers, or having sex with the customers.

16 10. On a regular basis, I observed Mr. Smith to sit at tables with regular customers and  
17 or "VIPs" and to drink alcohol with them. On occasion, I happened to see customers handing  
18 Mr. Smith cash. General Manager Hofman referred to Mr. Smith's conduct as "promoting the  
19 Club." I inferred Mr. Smith was receiving money from customers in order to arrange liaisons  
20 with dancers off of the premises of the Spice House.

21 11. I was aware of the sexual harassment complaint made by my co-employee Chelsea  
22 Long. I became aware of her problem with Mr. Smith when I encountered Chelsea Long on the  
23 premises of the Spice House in 2018 and she was very upset. Ms. Long told me she had been  
24 laying down on a couch in one of the upstairs VIP room and Mr. Smith had pulled her pants  
25 and panties and masturbated while standing over her. I knew Ms. Long and it was obvious to  
26 me by observing her demeanor that Ms. Long was very upset. She was crying hysterically and  
27 shaking and could barely speak. I accompanied Ms. Long and watched as she told General  
28 Manager Hofman what Clifton Kyle Smith had done to her. Mr. Hofman told Ms. Long he had



1 to call Kami Kashmiri and attorney Mark Thierman. Mr. Hofman subsequently came  
2 downstairs and informed myself and Ms. Long that Mr. Smith had been fired.

3 12. I was under standard instructions that when a serious incident happened on the  
4 premises of the Spice Club we were not to call the Police Department, or file any reports with  
5 the Spice House. That is, I was not to generate any documents. I understood Ms. Long did not  
6 file a complaint with the Police Department. I understood she did not do so because of the  
7 standard prohibition against informing the Police Department of criminal conduct which  
8 occurred on the premises of the Spice House.

9 13. About five months after Mr. Smith was fired for pulling Ms. Long's pants and  
10 panties down and masturbating over her, Mr. Smith was rehired. General Manager Hofman  
11 told me Kyle is coming back because it is hard to find people to work in the Club and he "did  
12 his time by losing his job and not being able to work." I knew not to object because of the  
13 preferential treatment General Hofman had previously extended to Mr. Smith and I knew they  
14 did illegal drugs together and were friends. I did not want to lose my job and so I said very  
15 little.

16 14. On or about March 16, 2019, the day after [REDACTED] is reputed to have been  
17 raped in the women's bathroom by Mr. Smith, Mr. Smith was a no-call, no-show at the Club. I  
18 spoke with General Manager Hofman, after learning of Mrs. [REDACTED] allegations. I first texted  
19 General Manager Hofman and told him I needed to speak with him regarding Kyle. We spoke  
20 in the presence of Chelsea Long. I told General Manager Hofman and I told him I did not want  
21 Mr. Smith working on my shifts anymore. I attempted to use the no-call, no-show as a basis  
22 for getting Mr. Smith off of my shifts because I no longer felt safe with him. I already knew,  
23 because I spoke with Chelsea Long that General Manager Hofman told her he intended to lie  
24 for Kyle, i.e., to tell the police he had been in the bathroom with Mr. Smith and Mrs. [REDACTED]  
25 and that Mr. Smith had not raped Mrs. [REDACTED]. In response to me saying I did not want Mr.  
26 Smith on my shift, General Manager Hofman yelled at me and told me "Kyle's not the  
27 problem, you're the problem." He told me I could not work with anyone and I was the  
28 problem. I shut down and stopped speaking with General Manager Hofman.




1 15. I attended a meeting on March 20, 2019, on the premises of the Spice House. I  
2 tape-recorded that meeting. I did so because I knew there was a high likelihood Mr. Hofman  
3 and/or Mr. Jami Kashmiri would subsequent lie about what was said. At that meeting, General  
4 Manager Hofman admitted he had fielded the complaint of Chelsea Long in 2018 regarding  
5 Mr. Smith pulling her pants and panties down and masturbating while standing over her.  
6 During the same meeting, Jamie Kashmiri focused on the fact some of us women drank in the  
7 Club off-hours and he threatened our jobs by threatening to close the Club. I did not return to  
8 work after that meeting because I no longer wished to work at the Club. I knew I would be  
9 subject to retaliatory hostility and retaliation by General Hofman because Mr. Smith had once  
10 again been fired for sexual misconduct. I provided that electronic of the meeting, which I did  
11 not alter in any way, to my attorney, Mark Mausert.

12 16. I have filed a Charge of Discrimination with the Nevada Equal Rights Commission  
13 and intend to pursue my Title VII rights against Diamond Dolls, my former employer.  
14 However, nothing about that circumstance has caused me to alter my statements herein in any  
15 way.

16 I hereby declare under penalty of perjury the statements made herein are correct.  
17 Dated this 19<sup>th</sup> day of July, 2019.

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Julie Ramos